

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
) NSD File No. L-98-27
Telephone Number Portability) CC Docket No. 95-116

**SUPPLEMENT TO PETITION TO EXTEND TIME FOR
NETWORK IMPLEMENTATION**

BellSouth Corporation,¹ on behalf of itself and each of its affiliated companies that are subject to Part 52, Section 52.23(a) of the Commission's Rules, 47 C.F.R. § 52.23(a) (BellSouth), hereby files this supplement to its March 2, 1998 petition to extend the time by which implementation of a long-term database method for number portability (LNP) in the BellSouth network will be completed in all MSAs within Phase I, II, III, V and V of the Commission's LNP implementation schedule within the Southeast Number Portability Administration Center (NPAC) Region 4. This supplement modifies the implementation schedule originally proposed by BellSouth on March 2, 1998 and is based on the August 31, 1998 implementation date for Atlanta established in the Common Carrier Bureau's March 31,

¹ BellSouth Corporation (BSC) is a publicly traded Georgia corporation that holds the stock of, among other companies, BellSouth Telecommunications, Inc. (BST), a Bell operating company and local exchange carrier (LEC) that provides wireline telephone exchange service and exchange access service in parts of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina and Tennessee ("NPAC Region 4" or the "Southeast Region"). BST and BSC have or may form alternative local exchange carrier (ALEC), and competitive local exchange carrier (CLEC) affiliates to serve customers within and outside the Southeast Region where BellSouth has not traditionally held a franchise to provide telephone service.

1998 Waiver Order² and BellSouth's progress in meeting the August 31, 1998 implementation date, which will be the subject of a May 8 status report to the Bureau as required by the terms of the Waiver Order. BellSouth provides further information in support of its pending request and requests that the Commission, in its next order, grant firm implementation dates for all remaining Phases in accordance with the modified implementation schedule proposed herein.

BellSouth has undertaken significant efforts to implement LNP in Atlanta by August 31, 1998. Based on these efforts, the amount of interface development work remaining and the requirements of orderly intercompany testing among multiple providers across multiple MSAs in multiple states in succeeding LNP Implementation Phases, BellSouth is proposing to implement the remaining Phases in roughly thirty (30) day intervals beginning September 1, 1998, so that all five Phases will be completed by the end of the Commission's original deployment schedule, December 31, 1998. Specifically, BellSouth herewith modifies its implementation schedule to complete Phase II MSAs by September 30, Phase III MSAs by October 31, Phase IV MSAs by November 30, and Phase V MSAs by December 31, 1998³ assuming, of course, timely NPAC delivery:

² *Telephone Number Portability Petitions for Extension of the Deployment Schedule for Long-Term Database Methods for Local Number Portability Phase I*, CC Docket No. 95-116, NSD File Nos. L-98-20, L-98-28, L-98-27, L-98-24, L-98-21, L-98-09, L-98-29, L-98-30, L-98-26, L-98-31, L-98-22, L-98-23, L-98-32, L-98-25, *Order* (rel. March 31, 1998).

³ December 31, 1998 is the date the Commission originally established for completion of Phase V. However, BellSouth intends to complete implementation of Phase V MSAs on or about December 15, 1998, in light of the subsequent seasonal holidays.

Phase I	Phase II	Phase III	Phase IV	Phase V
Orig.: 182 days	Orig.: 135 days	Orig.: 91 days	Orig.: 92 days	Orig.: 92 days
10/1/97-3/31/98	1/1/98-5/15/98	4/1/98-6/30/98	7/1/98-9/30/98	10/1/98-12/31/98
Petition: 45 days	Pet'n.: 47 days	Pet'n.: 30 days	Pet'n.: 30 days	Pet'n.: 30 days
10/1/98-11/14/98	11/15/98-12/31/98	1/1/99-1/30/99	1/31/99-3/1/99	3/2/99-3/31/99
Waiver Order August 31, 1998	Supplement to Pet'n.: 9/30/98	Supplement to Pet.: 10/31/98	Supplement to Pet'n.: 11/30/98	Supplement to Pet'n.: 12/31/98
Atlanta	Miami Ft. Lauderdale Orlando Tampa	New Orleans Charlotte Greensboro Nashville	Memphis Louisville Jacksonville Raleigh W. Palm Beach Greenville	Birmingham Knoxville Baton Rouge Charleston Mobile Columbia

As BellSouth explained in its original petition, BST undertook substantial activities to meet the Commission's implementation schedule prior to requesting an extension of time for each affected switch within the Southeast Region. These activities included establishing an LNP using Advanced Intelligent Network (AIN) protocol between BellSouth service switching points (SSP) and the BellSouth AIN Service Control Points (SCP) and building a new LNP Gateway operations system (Gateway LSMS) designed to interface with the new master database of all ported numbers in the Southeast Region (the NPAC SMS database) which was to have been provided by the former Local Number Portability Administrator (LNPA), Perot Systems. On February 10, 1998, the Southeast Region Number Portability Administration Company, L.L.C.

(Southeast LLC) terminated its contract with the former LNPA, Perot Systems, as a result of its failure to provide the NPAC SMS database, and substituted the current LNPA, Lockheed Martin.

BellSouth further advised the Bureau in its original petition that the new Lockheed Martin NPAC SMS database is a full seven (7) NANC LNP software specification releases beyond the NPAC SMS database that was to have been delivered by Perot Systems, and that this fundamental difference in NPACs interface specification will require BellSouth to engineer and develop significant software modifications to its NPAC interface, the BellSouth LNP Gateway Service Management System (LNP G/W). The Bureau determined that BellSouth satisfied the requirements of the Commission's rules with respect to demonstrating the need for an extension of the implementation date, and that it demonstrated unique circumstances that justify additional time it needs to implement LNP.⁴ Nevertheless, the Commission did not grant BellSouth's request to extend the Phase I implementation deadline to November 14, 1998, but rather granted a waiver to BellSouth until August 31, 1998.

On the date of the Bureau's Waiver Order, BellSouth had completed all of its network implementation for LNP within the Atlanta MSA, and was then and is now querying in 100% of its switches. BellSouth has substantially completed network implementation within Phase II MSAs, is currently querying on 91% of all switches, and is on track to complete its network installation by May 15, 1998, the Commission's original deadline. With respect to Phase III MSAs, all service control points and related software have been installed. Querying has also begun in Phase III MSAs, and BellSouth remains on track to complete its internal network implementation efforts for Phases III, IV and V.

⁴ Waiver Order, para. 41.

With respect to its Lockheed Martin NPAC interface development efforts, BellSouth was driven by the August 31, 1998 date in the Waiver Order to arrive at a software solution that would permit certification with the Lockheed Martin NPAC in time to begin final industry end-to-end testing on July 15, 1998. BellSouth had previously targeted its internally developed LNP G/W software release R1.7 as the production release software for the Lockheed Martin NPAC interface that would have contained the necessary NANC 1.8 changes as well as additional ordering and provisioning functionality for competitive local exchange carriers. This target release, together with associated development efforts, was the keystone to BellSouth requesting an implementation date of November 14, 1998 for Atlanta.

It being impossible to have LNP G/W R1.7 ready by July 15, 1998, BellSouth sought to evaluate whether or not an absolutely minimal subset of NANC 1.8 functionality, which would enable NPAC certification, could be built into an earlier version of its interface software, LNP G/W R1.5. BellSouth contracted with outside consultants who were individually and personally involved in the original development of the Lockheed Martin NPAC software in order to maximize the probability of success of this engineering challenge. With the help of these consultants, Telecommunications Software Enterprises, BellSouth was able to refine its development and testing intervals to the extent that BellSouth believes that it can develop and load a production version of LNP G/W R1.6 by July 15, 1998 in order to conduct industry testing.

Based on the success of interoperability testing of the LNP G/W R1.1 platform over dial-up facilities, BellSouth began turn-up testing of LNP G/W R1.5 over dedicated facilities on April 11, 1998. To date, 40 out of 45 test suites have passed, and BellSouth remains guardedly optimistic that it can complete development of R1.6 with the minimal subset of NANC 1.8

change orders necessary to certify to the Lockheed Martin NPAC shortly, with testing to begin in two weeks. Nevertheless, additional interface software functionality remains to be developed, and BellSouth's modified implementation schedule represents the minimum time necessary to implement LNP in the remaining four phases after August 31 in light of this additional development and the need for rigorous intercompany testing.

Intercompany testing for all phases of number portability is being planned within the Southeast NPAC Region including multiple tests between pairs of service providers. Testing includes the ordering process (sending porting requests between service providers, issuing service orders), provisioning process, (working service orders, updating downstream systems, notifying NPAC of completion, receiving broadcast information from the NPAC, processing broadcast information through the local service management systems to the service control point databases) and call completion (multiple test call both to and from newly ported numbers). Several rounds of tests will be performed; and, in some instances, it is necessary to test serially.

As stated above, thirty days is a minimum interval necessary to accommodate the requirements of intercompany testing. BellSouth's modified schedule takes this into account and is the minimum time needed to accommodate responsible intercompany testing as well as the continuing interface software development efforts, including development of NPA split functionality. Within the Southeast Region, Phase I contains one MSA within one state. However, Phase II contains multiple test locations because there are four MSAs within a single state. Phase III is even more complicated because there are three different states involved, and one state has two MSAs, while Phase V presents more challenges as six MSAs are distributed across five different states. Multiple service provider testing participants have been identified in these locations, and it is reasonable to expect that as the time for LNP implementation

approaches, more carriers will need to participate in testing. Phase V contains the Baton Rouge MSA which is undergoing an area code split affecting all 17 of the switches in the Baton Rouge MSA earlier identified in BellSouth's March 2, petition. Three of the 47 New Orleans (Phase III) MSA switches identified in the March 2, 1998 filing are affected by the Baton Rouge split, and BellSouth's modified schedule allows minimum sufficient time to accommodate full LNP capability in these three switches.⁵

Finally, BellSouth urges the Commission to act on BellSouth's earlier filed petition as a whole, and grant its revised implementation schedule in its entirety, rather than respond by issuing piecemeal orders. BellSouth has already satisfied its burden of demonstrating the requirements necessary to achieve an extension of time.⁶ BellSouth has undertaken an ambitious, focused and concentrated customized interface development effort in light of the Waiver Order's August 31, 1998 implementation deadline for Atlanta. BellSouth has revised its implementation schedule to implement LNP in all remaining phases in a manner that is consistent with the Waiver Order, responsible network engineering and which ultimately complies with Commission's original deployment schedule for final completion of all Phases by December 31, 1998. BellSouth's planning efforts are clouded by the uncertainty surrounding the timing and ultimate determinations arising out of the Bureau's apparent intent to react to BellSouth's

⁵ Convent CNVNLAMADSO; Lutchter LTCHLAMADSO; and Vacherie VCHRLAMADSO.

⁶ Waiver Order, para. 41.

pending petition incrementally by phase. With the certainty of a single resolution for all phases, BellSouth can focus its entire efforts on implementing LNP within the Southeast NPAC Region.⁷

CONCLUSION

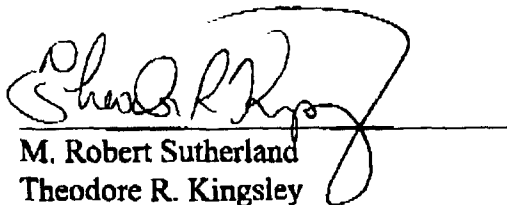
Having previously found that BellSouth's March 2, 1998 Request For Extension of Time complies fully with the Commission's requirements therefor, and in light of the modifications to its original implementation schedule proposed herein based upon the determinations of the March 31 Waiver Order, the Commission's original implementation schedule, BellSouth's continuing NPAC interface development efforts and the requirements for responsible intercompany testing in all phases, particularly multi-state, multi-MSA, multi-carrier environments and, good cause being shown, the Commission should grant an extension of the Commission's LNP implementation schedule and a waiver for each Phase in the Southeast NPAC Region as follows: Phase I (August 31, 1998), Phase II (September 30, 1998), Phase III

⁷ Although BellSouth requests that the Bureau rule on BellSouth's remaining extensions requests at one time, and desires this request be granted in its next order addressing BellSouth's pending request for extension of Phase II, BellSouth does not intend that the grant of this request relieve BellSouth from the status report obligations imposed by the Bureau upon BellSouth in its March 31, 1998 Waiver Order.

(October 31, 1998), and Phase IV (November 30, 1998). BellSouth withdraws its request for an extension of the implementation date for Phase V.

Respectfully submitted,

BELLSOUTH CORPORATION



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Date: May 1, 1998


CERTIFICATE OF SERVICE

I do hereby certify that I have this 1st day of May, 1998, served all parties to this action with a copy of the foregoing **PETITION FOR WAIVER** by placing a true and correct copy of same in the United States Mail, postage prepaid, addressed to the parties listed hereinbelow.

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